



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

77 WEST JACKSON BOULEVARD

CHICAGO, IL 60604-3590

176711

REPLY TO THE ATTENTION OF:

DATE: NOV 1 1992

SUBJECT: **ACTION MEMORANDUM** - Request for a Time Critical Removal Action at the A. A. Waste Oil site, Rock Island, Rock Island County, Illinois (Site ID #RT)

FROM: Kenneth Theisen, On-Scene Coordinator *Kenneth Theisen*

TO: William E. Muno, Acting Director
Waste Management Division

THRU: Jodi L. Traub, Acting Associate Division Director
Office of Superfund *Jodi Traub*

I. PURPOSE

The purpose of this memorandum is to request your concurrence to expend up to \$602,000 to conduct a time critical removal action at the A. A. Waste Oil site located at 1800 78th Avenue in Rock Island, Illinois. The proposed removal action will remove the threat of public exposure to hazardous wastes and eliminate the potential release of hazardous wastes to the environment, posed by polychlorinated biphenyl (PCB) contaminated waste oils stored at the abandoned facility.

It is estimated that 350,000 gallons of waste oil, with at least 20,000 gallons contaminated with PCBs, are stored on site. Three storage tanks were sampled for PCBs including tank #T2 which was marked with a PCB label, indicating PCBs in the amount of 2,800 ppm (parts per million). In addition, PCB-contaminated soil is present in the area of the tank farm as indicated by soil sample #S2 (32ppm). In addition, several drums of paint wastes are stored in a building on site.

This site is not on the National Priorities List (NPL) and is not nationally significant.

II. SITE CONDITIONS AND BACKGROUND

The CERCLIS identification number for this site is ILD000810291. This is a time critical removal action.

The A. A. Waste Oil site is an abandoned waste oil storage, processing and transfer facility. The site consists of three small buildings and a tank farm. The tank farm is surrounded by

earthen secondary containment and a seven foot chain link fence. Fourteen vertical storage tanks with a total capacity up to 650,000 gallons are found in the tank farm, with numerous evidence of past spills also in evidence.

The site is situated on approximately two acres in a mixed light industrial, rural setting. It is bordered on the west and south by vacant land, on the east by several small industries, and on the north by the Chicago, Rock Island and Pacific Railroad, and 78th Avenue.

The facility began operation as A.A. Waste Oil in 1970 under the ownership of Industrial Fuels, Inc. of Springfield, Illinois. In 1983 the facility was purchased by Moreco Energy Inc, retaining the original name. A. A. Waste oil treated a variety of oils primarily employing an oil/water emulsion separation method, which utilized a boiler or distillation unit. Treated oil was either sold as a fuel or shipped off site for re-refining. While in operation the facility received an average of about 200,000 gallons of oil per month. Residual water with trace oils was sold as a dust control agent. The facility shut down in 1991.

The facility initially operated under a generic special waste permit, required by the Illinois Environmental Protection Agency (IEPA) for a Treatment, Storage and Disposal (TSD) facility. In August of 1981, A.A. Waste Oil submitted a 103(c) hazardous waste site notification. Listed on the notification under specific waste types were U.S. EPA waste codes: K048, K049, K050, K052, D008 and D001.

The (IEPA) has conducted a number of inspections over the years, documenting numerous operating violations.

In July of 1985, the Attorney General of the State of Illinois issued a Temporary Restraining Order against the A. A. Waste Oil site and Moreco Energy, Inc. The injunction stipulated various requirements including: secure the site; cease and desist from further depositing or allowing the depositing of liquids into leaking tanks; cease and desist from allowing the discharge of liquids off site; formulate plans to study and to test all storage tanks and on-site soils and groundwater, and properly remediate and dispose of hazardous wastes on site. It is not known how many or if any of the stipulations were adhered to before the facility ceased operations.

In 1989 the IEPA proposed that the facility be listed as a hazardous waste site within the State of Illinois. In April 1991 the IEPA filed a Consent Order requiring Moreco Energy, Inc., to conduct remedial activities. The order not only included the A.A. Waste Oil site, but additional Moreco Energy owned sites located in Illinois. Because of Moreco's financial inability to perform the necessary work and IEPA's lack of available funds, the U.S. EPA was asked for assistance by Mr. James Janssen of the IEPA.

On March 27, 1991, the U.S. EPA conducted a site assessment (SA) with the IEPA and a representative from Moreco also present. Sample results from this assessment indicated storage tanks with various hazardous volatile organic compounds and PCBs present on site. The firm filed for bankruptcy in June of 1991.

III. THREAT TO PUBLIC HEALTH OR WELFARE OR THE ENVIRONMENT, AND STATUTORY AND REGULATORY AUTHORITIES

Conditions at the A. A. Waste Oil site that warrant a removal action, as set forth in paragraph (b)(2) of Section 300.415 of the National Contingency Plan (NCP), include:

- (i) Actual or potential exposure to nearby populations, animals, or the food chain from hazardous substances or pollutants or contaminants.

Analytical results of three storage tanks samples collected by the Technical Assistance Team (TAT) during the (SA) indicated the presence of hazardous substances such as 1,1,1-trichloroethane, tetra-chloroethene, toluene, xylene and PCBs. As a result of the facility being abandoned, any release would not be properly or expeditiously addressed. This, together with the facility being located in direct proximity to the Rock River and only a short distance from the Mississippi River, makes any release a very real threat to both public health and the environment. Also, the presence of PCBs on site poses a direct contact threat to local residents.

- (ii) Hazardous substances or pollutants or contaminants in drums, barrels, tanks, or other bulk storage containers that may pose a threat of release.

Due to the facility being abandoned and the lack of any sort maintenance program on the tanks or their valves or piping, a release will eventually occur. The present condition of the tanks, rusted and in a general state of disrepair, indicates that they have deteriorated over the past years. Numerous evidence is present indicating a history of past spills. Also, the presence of approximately twenty, 55 gallon drums of paint wastes, possibly containing hazardous wastes, poses an additional threat of a release.

- (iii) High levels of hazardous substances or pollutants or contaminants in soils largely at or near the surface, that may migrate.

Analytical results of a soil sample collected at the site indicated the presence of PCBs at 32 parts per million (ppm). The National Contingency Spill Cleanup Policy (40 CFR, Part 761) regulated under TSCA, requires that cleanup levels for restricted access locations be set at 25 ppm or less, while cleanup levels for unrestricted areas be set at 10 ppm. Unless acted upon these

soils may migrate off the site into the adjacent Mississippi River system due to erosion or other natural occurrences.

IV. ENDANGERMENT DETERMINATION

Given the site conditions, the nature of the hazardous substances on site, and the potential exposure pathways to nearby populations described in Sections II and III above, actual or threatened releases of hazardous substances from this site, if addressed by implementing the response actions selected in this Action Memorandum, may present an imminent and substantial endangerment to public health, or welfare, or the environment.

V. PROPOSED ACTIONS AND ESTIMATED COSTS

The approximate 350,000 gallons of waste oil found on site will be recycled for fuel blending at an appropriate facility. The PCB contaminated liquids will be transported and properly disposed of at a TSCA approved hazardous waste incinerator. The 20 drums of paint wastes will be characterized and sent to the proper facility for disposal.

All applicable or relevant and appropriate requirements (ARARs) of Federal law will be complied with to the extent practicable. A letter has been sent to the IEPA requesting that it identify State ARARs. Any State ARAR identified in a timely manner for this removal action will be complied with to the extent practicable.

The response actions described in this memorandum directly address actual or threatened releases of hazardous substances, pollutants or contaminants at the facility which may pose an imminent and substantial endangerment to public health and safety, and to the environment. These response actions do not impose a burden on affected property disproportionate to the extent to which that property contributes to the condition being addressed.

The On-Scene Coordinator has begun planning for provision of post-removal site control, consistent with the provisions of Section 300.415(k) of the NCP.

The removal action will be comprised of the following actions:

1. Develop and implement a site safety plan.
2. Secure the site.
3. Sample and dispose of the paint wastes, PCB contaminated liquids and sludges, and waste oils and sludges.
4. Sample and dispose of any contaminated soils.

5. Decontaminate and scrap all tanks on site.
6. Evaluation of soil and groundwater for potential remedial action.

The detailed Emergency Response Cleanup Services (ERCS) contractor cost breakdown is presented in Attachment A, with the estimated project costs below.

EXTRAMURAL COSTS

Clean-up Contractor Costs	\$350,000
20% Contingency	\$ 70,000
Subtotal	\$420,000
Total TAT, including multiplier costs	<u>\$ 30,000</u>
Extramural Subtotal	<u>\$450,000</u>
Extramural Contingency (20% of extramural Subtotal rounded to the nearest thousand)	<u>\$ 90,000</u>
TOTAL, EXTRAMURAL COSTS	\$540,000

INTRAMURAL COSTS

U. S. EPA Direct Costs (\$30 x 720 regional hrs. + 72 HQ hrs.)	\$ 24,000
U. S. EPA Indirect Costs (\$53 X 720 Regional hrs.)	<u>\$ 38,000</u>
TOTAL, INTRAMURAL COSTS:	\$ 62,000
TOTAL, REMOVAL PROJECT CEILING	\$602,000

VI. EXPECTED CHANGE IN THE SITUATION SHOULD ACTION BE DELAYED OR NOT TAKEN

Due to the facility being abandoned and containing known hazardous materials including PCBs in deteriorating tanks, delayed action may result in the release of hazardous materials onto the surrounding properties and into the Rock River and Mississippi River systems.

VII. OUTSTANDING POLICY ISSUES

None.

VIII. ENFORCEMENT

For administrative purposes, information concerning the enforcement strategy for this site is contained in an Enforcement Confidential addendum.

XI. RECOMMENDATION

This decision document represents the selected removal action for the A. A. Waste Oil site, in Rock Island, Rock Island County, Illinois, developed in accordance with CERCLA as amended, and is not inconsistent with the NCP. This decision is based on the Administrative Record (Attachment C) for the site. Conditions at the site meet the NCP Section 300.415(b)(2) criteria for a removal and I recommend your approval of the proposed removal action. The total project ceiling, if approved, will be \$602,000. Of this total, an estimated \$420,000 may be used for cleanup contractor costs.

APPROVE: _____

Wm. E. Myers
DIRECTOR, WASTE MANAGEMENT DIVISION

DATE: 11/30/92

DISAPPROVE: _____

DIRECTOR, WASTE MANAGEMENT DIVISION

DATE: _____

ATTACHMENTS: A. BREAKDOWN OF ERCS COSTS
B. ENFORCEMENT CONFIDENTIAL INFORMATION
C. ADMINISTRATIVE RECORD INDEX

cc: T. Johnson, OS-210
S. Huff, U. S. Department of the Interior
230 South Dearborn Street, Room 3422
Chicago, Il. 60604
W. Childs, IEPA

bcc: A. Bauman, HSRL-6J
R. Powers/R. Buckley, HSEGI
R. Bowden, HSE-5J
M. O'Mara, HSE-5J
L. Fabinski, ATSDR, HSRL-5J
O. Warnsley, CRU, HSRLT-5J
T. Lesser, P-19J
F. Myers, MF-10J
EERB Read File (M. Johnson)
EERB Delivery Order File (L. Zintak)
EERB Site File (Char Gwizdala, Central File Room)
W. Massie, Contracting Officer, MC10-J
K. Theisen, On-Scene Coordinator
L. Beasley, Enforcement Specialist
T. Branigan, CS-3T

ATTACHMENT A.

BREAKDOWN OF ERCS COSTS

Contractor Personnel	\$50,000
Contractor Equipment	\$15,000
Materials	\$20,000
Subcontractors	\$30,000
Waste Transportation	\$55,000
Waste Disposal	\$180,000
TOTAL	<hr/> \$350,000

ATTACHMENT B
ENFORCEMENT CONFIDENTIAL

Redacted-information not relevant to the selection of the removal action.

ATTACHMENT C
ADMINISTRATIVE RECORD
FOR
A.A. WASTE OIL
ROCK ISLAND, ILLINOIS

November 6, 1992

<u>DATE</u>	<u>AUTHOR</u>	<u>RECIPIENT</u>	<u>TITLE/DESCRIPTION</u>	<u>PAGES</u>
05/27/92	Stimple, B., E & E	U.S. EPA	Site Assessment	108
00/00/00	Theisen, K., U.S. EPA	Muno, W., U.S. EPA	Action Memorandum (Pending)	